## PacifiCorp - Stakeholder Feedback Form

## 2019 Integrated Resource Plan

PacifiCorp (the Company) requests that stakeholders provide feedback to the Company upon the conclusion of each public input meeting and/or stakeholder conference calls, as scheduled. PacifiCorp values the input of its active and engaged stakeholder group, and stakeholder feedback is critical to the IRP public input process. PacifiCorp requests that stakeholders provide comments using this form, which will allow the Company to more easily review and summarize comments by topic and to readily identify specific recommendations, if any, being provided. Information collected will be used to better inform issues included in the 2019 IRP, including, but not limited to the process, assumptions, and analysis. In order to maintain open communication and provide the broader Stakeholder community with useful information, the Company will generally post all appropriate feedback on the IRP website unless you request otherwise, below.

							Date of S	Submittal	10/4/2018
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List additional organization attendees at cited meeting: Click here to enter text.									
	` '	l/or Agenda Items: List the options in coal unit retirement				_		your coi	mments.
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\*Respondent Comment: Please provide your feedback for each IRP topic listed above.

In the last stakeholder input meeting, PacifiCorp reported that it is planning to lock in the carbon scenarios and begin coal retirement model runs within one week. To that end, we request that PacifiCorp provide the vender studies underlying the different carbon cost assumptions proposed for use in the coal unit retirement analysis and IRP to the parties submitting this feedback form. The parties request that PacifiCorp provide this information to the parties at least one week before PacifiCorp begins its coal unit retirement analysis.

Given the impact of the carbon cost scenarios on the coal unit retirement analysis and IRP, we also ask that PacifiCorp delay the start of the coal retirement analysis until the parties receive and review the vender reports. We understand the need to begin this analysis as soon as possible and we are happy to provide our feedback by the October 16 stakeholder feedback deadline in the Oregon docket (LC 70). If this timeline is agreeable, please provide the reports by the end of business on Monday, October 8 to allow the parties enough time to review.

## **PacifiCorp Response:**

Requested materials were provided.

If PacifiCorp feels the need to start the coal unit retirement analysis before the parties receive and review the vender reports, we recommend using the EIA's Annual Energy Outlook 2018 medium sensitivity, as depicted on slide 44 of the

September 27-28 stakeholder meeting deck, as the new base case for both the coal unit retirement analysis and IRP base case. For this new base case we propose that PacifiCorp implement this cost curve in 2024, beginning with the 2024 cost. Further, we recommend using the social cost of carbon as depicted in slide 47 of the September 27-28 stakeholder meeting deck as the new high price scenario.

Without having reviewed the vender reports, we believe that these proposed base case and high price carbon assumptions, in combination with a zero cost scenario, will provide a more balanced and reasonable analysis than PacifiCorp's proposed carbon assumptions. The EIA's medium sensitivity is a reasonable middle ground between two bookend scenarios, one with a zero cost of carbon and one assuming the social cost of carbon. Taken together, these three scenarios provide a comprehensive look at carbon risk that is based on publicly available information, which is much easier for all parties to review.

## **PacifiCorp Response:**

In response to the request to review the vendor reports that informed the CO<sub>2</sub> price assumptions discussed at the September 27-28, 2018 Integrated Resource Plan (IRP) public input meeting, the requested reports were sent.

Please also see revised base CO<sub>2</sub> assumption discussed on the October 9, 2018 IRP public input meeting conference call.

**Data Support:** If applicable, provide any documents, hyper-links, etc. in support of comments. (i.e. gas forecast is too high - this forecast from EIA is more appropriate). If electronic attachments are provided with your comments, please list those attachment names here.

**Recommendations:** Provide any additional recommendations if not included above - specificity is greatly appreciated. PacifiCorp should hold a technical conference on the Intra-Hour Dispatch Credit before locking analysis and modeling related to the Credit into the 2019 IRP. This will allow parties a chance to better understand how the Credit will affect the IRP and will result in more meaningful feedback from stakeholders.

Please submit your completed Stakeholder Feedback Form via email to IRP@Pacificorp.com

Thank you for participating.